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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, individually and on)	
behalf of all others similarly situated,)	Civil Action No.: 18-2293 (FLW)(ZNQ)
)	
Plaintiff,)	Hon. Freda L. Wolfson
)	
v.)	DECLARATION OF LAURA
)	LESTRADE IN SUPPORT OF
RIOT BLOCKCHAIN, INC. f/k/a BIOPTIX,)	DEFENDANT MIKE DAI'S MOTION
INC., JOHN O'ROURKE, JEFFREY)	FOR LEAVE TO FILE A SUR-REPLY
MCGONEGAL, BARRY HONIG,)	IN SUPPORT OF HIS MOTION TO
CATHERINE DEFRANCESCO, MICHAEL)	DISMISS LEAD PLAINTIFF'S
BEEGHLEY, JOHN STETSON, MARK)	CORRECTED CONSOLIDATED
GROSSMAN, ANDREW KAPLAN, MIKE)	AMENDED CLASS ACTION
DAI, JASON LES and ERIC SO,)	COMPLAINT
)	
Defendants.)	

I, Laura Lestrade, of full age, hereby declare and state that:

1. I am an attorney associated with the firm of Dorsey & Whitney LLP, attorneys for defendant Mike Dai ("Mr. Dai") in the above-captioned matters. I make this Declaration in Support of Mr. Dai's Motion for Leave to File a Sur-Reply in Support of His Motion to Dismiss Lead Plaintiff's Corrected Consolidated Class Action Complaint. I have personal knowledge of

the facts stated herein and, if called upon to testify under oath, I could and would testify competently thereto.

2. Attached hereto as Exhibit “A” is a true and correct copy of Defendant Mike Dai’s Proposed Sur-Reply Brief.

3. Attached hereto as Exhibit “B” is my declaration in support of Defendant Mike Dai’s Leave to File a Sur-Reply in Support of His Motion to Dismiss Lead Plaintiff’s Corrected Consolidated Amended Class Action Complaint.

DATED: February 19, 2020,

By: /s/ Laura M. Lestrade
Laura M. Lestrade